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January 28, 2022

VIA Electronic Case Filing System

Honorable Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 24A
New York, New York 10007
Fax: (212) 805-7942

*Re: Joint Letter Requesting Sealing of Documents
Capital Markets Placement, Inc. v. Talent.com Inc. and Neuvoo Inc., 21-cv-6845*

Dear Judge Woods,

The parties write to jointly request that certain exhibits to Plaintiff's Complaint and Defendant's Answer and Counterclaims be placed under seal because they were inadvertently filed with unredacted bank account numbers. Specifically, the parties seek to place under seal Exhibits C (ECF No. 1-3) and D (ECF No. 1-4) to Plaintiff's Complaint and Exhibits 2 (ECF No. 19-2) and 3 (ECF No. 19-3) to Defendant's Answer and Counterclaim. Given the sensitive nature of this confidential financial information, good cause exists to seal these exhibits. Moreover, no material substantive information will be removed from the public record, as versions of these exhibits merely redacting the account numbers have already been filed.

Pursuant to the Electronic Case Filing Rules & Instructions for the Southern District of New York ¶ 21.7, the parties have contacted the ECF Help Desk via email at helpdesk@nysd.uscourts.gov to make an emergency sealing request and have filed redacted versions of the exhibits through the ECF System.

Respectfully submitted,

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Inc., formerly known as Neuvoo Inc.*

The parties' joint request to place certain documents under seal is granted.

SO ORDERED.

Dated: January 29, 2022
New York, New York



GREGORY H. WOODS
United States District Judge